

AO 91 (Rev. 01/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Western District of Tennessee

United States of America)
v.)
MARIO EWING, THOMAS VAUGHN)
DEANDRE TAYLOR, EDWARD JONES, and)
JOSHUA SHELTON)

Case No.

11CR20194

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 7/21/2011 in the county of SHELBY in the WESTERN District of
TENNESSEE, the defendant violated 18 U. S. C. § 2113(a); 18 U.S.C. § 924(c) and 18 U.S.C. § 1951
an offense described as follows:

Did, by force, violence and intimidation take from the person and presence of another money belonging to and in the care, custody, control, management and possession of the Bank of America, 3945 Park Avenue, Memphis, TN, and did during the course of the bank robbery use and carry a firearm.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

✓ Continued on the attached sheet.



Complainant's signature

DAYNE HENRIQUES - FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

July 25, 2011

s/ Tu M. Pham

Judge's signature

City and state:

MEMPHIS, TENNESSEE

TU M. PHAM MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT

I, Dayne Henriques, being duly sworn on oath due here by depose and state the following:

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed for about 2 years. I am presently assigned to the Safe Streets Task Force with the duties of investigating violent crimes including bank robberies, carjackings and business robberies in the Memphis area. The following information is based upon my personal knowledge, upon information provided to me by other law enforcement officers, and information provided to me by witnesses with personal knowledge.

2. On July 21, 2011 at approximately 10:19 a.m., the Bank of America, 3945 Park Avenue, Memphis, Tennessee was robbed. The two subjects entered the bank with firearms displayed. The subjects made threats to customers and bank employees. A customer was assaulted by the subjects, as they made their way to the bank counter. The subjects demanded money and bank tellers complied with the subject's demand. The subjects left through the front door and were last seen headed southbound on Getwell, in a late 90's White 4 door Cadillac. The Cadillac was recovered a short distance from the bank by Memphis Police Department.

3. Four subjects were observed by Jonathan Cross near Park Avenue and Goodman Road. Cross observed 3 males getting into a White 4 door Cadillac and one male getting into a green Chevy Malibu. Cross followed the subject to Bank of America, located at 3945 Park Avenue, in which he observed two of the male subjects getting dressed with black rags over their faces and proceeded to enter the bank.

4. Cross immediately called 911 to report the incident. Cross then observed the two male subject leaving the bank and getting into the White Cadillac. Cross followed the vehicles as they left the bank south on Getwell. Cross was able to get the vehicle tag off of the green Chevy Malibu, Tennessee Tag 205ZRZ.

5. Cross followed the vehicle in which he observed them parking the White Cadillac on Staurt and then getting into the Chevy Malibu.

6. Memphis Police Department record and database checks revealed that the register vehicle owner was Sherika Valentine. Ms. Valentine was brought to the Memphis Police Department Robbery Office in which she gave a statement that a Mario Ewing borrowed her car that morning around 7:30 a.m. and was supposed to return her vehicle around 4:00 p.m.

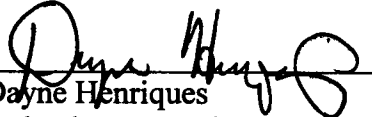
7. On July 21, 2011 at approximately 6:30 p.m. a photograph displayed was developed consisting 6 male subjects with similar features of Mario Ewing to include Ewing in the display. Jonathan Cross was show the photograph displayed in which he identified Ewing as the individual driving the Green Malibu in the neighborhood near Park and Goodman road and the same individual he saw driving to the Bank of America.

8. Mario Ewing and Thomas Vaughn was picked up for questioning by members of the Memphis Police Department PSN Unit. Thomas Vaughn agreed to talk to investigators.

OH TMP
9 Thomas Vaughn was interviewed by members of the Safe Streets Task Force where he was advised and waived his Miranda Rights. Vaughn confessed in participating in the robbery of the Bank of America located at 3945 Park Avenue, Memphis, Tennessee on ~~June 27~~ ^{July 21}, 2011. Vaughn provided a signed statement in which he participated in the bank robbery in which he implicated Edward Jones and Joshua Shelton both armed with handguns as the bank robbers and Deandre Taylor as the getaway driver in the White Cadillac and Mario Ewing as the driver of the follow car Green Chevy Malibu and Vaughn was driving a Silver Grand AM as a lookout. Vaughn stated that he received \$900.00 to \$1000.00 in proceed from the robbery.

OH TMP
10. Mario Ewing was interviewed by members of the Safe Streets Task Force where he was advised and waived his Miranda Rights. Ewing confessed in participating in the robbery of the Bank of America located at 3945 Park Avenue, Memphis, Tennessee on ~~June 27~~ ^{July 21}, 2011. Ewing provided a signed statement in which he participated in the bank robbery in which he implicated Edward Jones and Joshua Shelton both armed with handguns as the bank robbers and Deandre Taylor as the getaway driver in the White Cadillac and Thomas Vaughn driving a Silver Grand Am as a lookout driver and Ewing as the driver of the follow car Green Chevy Malibu. Ewing stated that he received \$1000.00 in proceed from the robbery.

11. Bank of America located at 3945 Park Avenue Memphis, Tennessee is insured by the Federal Deposit Insurance Corporation, a United States Government Agency, Insurance Certificate number 3510-6 issued on July 23, 1999.


Dayne Henriques
Federal Bureau of Investigation
Safe Streets Task Force

SWORN to and SUBSCRIBED before me this 25 day Julv 25 2011

s/ Tu M. Pham

Tu M. Pham
U.S. Magistrate Judge